

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

AMERICAN INTERNATIONAL GROUP, INC.,)
et al.,)

Plaintiffs,

V.

ACE INA HOLDINGS, INC., *et al.*,

Defendants.

No.: 07 CV 2898

Judge Robert W. Gettleman

Magistrate Judge Sidney I. Schenkier

LIBERTY MUTUAL INSURANCE CO., *et al.*,)

Counter-Claimants,

V.

AMERICAN INTERNATIONAL GROUP, INC.,)
et al.,)

Counter-Defendants.

No. 09 C 2026

Judge Robert W. Gettleman

Magistrate Judge Sidney I. Schenkier

SAFECO INSURANCE COMPANY OF)
AMERICA and OHIO CASUALTY)
INSURANCE COMPANY, individually, and on)
behalf of a class consisting of members of the)
National Workers Compensation Reinsurance)
Pool,)

Plaintiff,

V.

AMERICAN INTERNATIONAL GROUP, INC.,)
et al.,)

Defendants.

NOTICE OF MOTION

To: All Counsel of Record

PLEASE TAKE NOTICE that on Thursday, June 16, 2011, at 9:15 a.m., we shall appear before the Honorable Robert W. Gettleman or any judge sitting in his stead in Room 1703 of the United States District Courthouse, 219 South Dearborn Street, Chicago, Illinois, and then and there present the **ORIGINAL CLASS PLAINTIFFS' MOTION FOR LEAVE TO SUPPLEMENT THE RECORD IN OPPOSITION TO JOINT MOTION OF INTERVENORS AND AIG FOR CLASS CERTIFICATION AND PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**, a copy of which is hereby served upon you.

Dated: June 13, 2011

Respectfully submitted,

SAFECO INSURANCE COMPANY OF
AMERICA AND OHIO CASUALTY
INSURANCE COMPANY

By: s/ Gary M. Elden
One of their Attorneys

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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on June 13, 2011, I caused a true and correct copy of the foregoing **NOTICE OF MOTION** to be filed with the Clerk of the Court and served using the CM/ECF e-filing system upon all counsel of record.

s/ Gary M. Elden

Gary M. Elden